

3.7 CULTURAL RESOURCES

The Proposed Action and its alternatives could affect cultural resources. Cultural resources assessed as part of this EIS include prehistoric archaeological sites and historic resources.

The cultural resources ROI for each of the alternatives is defined as those areas where additional development may affect the historic or archaeological resources in those areas affected by ground disturbance associated with construction-related activities, or character of the setting of a historic property. For purposes of this analysis, the ROI is synonymous with the term "area of potential effect" described in cultural resources regulations. The area of potential effect is legislatively defined as "the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist" (Advisory Council on Historic Preservation, 1986).

Section 106 of the NHPA requires that possible effects on cultural resources be considered during planning and execution of federal undertakings and stipulates a process of consultation. While consultation with the Mississippi SHPO had been previously initiated during the production of this EIS, this document serves as the formal Section 106 consultation for the Proposed Action.

3.7.1 Resource Definition and Methodology

Cultural resources consist of prehistoric and historic districts, sites, structures, artifacts, and any other physical evidence of human activity considered important to a culture or community for scientific, traditional, religious, or other reasons. Cultural resources are divided into two categories: prehistoric archaeological resources and historic resources. Prehistoric archaeological resources are defined as physical remnants of human activity that predate the advent of written records in a particular culture or geographic region. They include archaeological sites, structures, artifacts, and other evidence of prehistoric human behavior.

Historic resources consist of physical properties or locations postdating the advent of written records in a particular culture or geographic region, such as archaeological sites, structures, artifacts, documents, or other evidence of human occupation. Historic resources also include submerged cultural resources such as shipwrecks and locations associated with events that have made a significant contribution to history or that are associated with the lives of historically significant persons.

The number of cultural resources present within the ROI was determined through field reconnaissance and research of existing literature at the Mississippi Department of Archives and History. This research included coverage of all archaeological surveys and inventories previously conducted within the project area as well as a review of the Mississippi Master Site File for information regarding cultural resources located within the ROI. This research included the following resources:

- All prehistoric archaeological resources potentially eligible for, eligible for, or listed on the National Register of Historic Places (NRHP);

- All historic resources or structures potentially eligible for, eligible for, or listed on the NRHP; and
- Traditional resources.

Impacts to the cultural resources located within the ROI that could occur as a result of the Proposed Action or its alternatives were then identified. The following major issues were considered during analysis of potential impacts to cultural resources:

- Potential direct impacts caused by construction activities including demolition, modification, or disturbance of properties potentially eligible for, or listed on the NRHP, and indirect impacts to the character, context, or visual setting of historic properties due to the construction of casino-related facilities in the immediate vicinity; and,
- Noise impacts to the character of historic properties due to the general increase in visitor population and activities on adjacent properties and increased traffic.

3.7.2 Prehistoric Archaeological Resources

In March 1998, Archaeology Mississippi, Inc. conducted a cultural resources survey of the Broadwater site in Biloxi, Mississippi. Review of the Mississippi Department of Archives & History site files indicates that four previously recorded archaeological sites are located within a one-mile radius of the Broadwater site (Archaeology Mississippi, Inc., 1998).

The majority of the Broadwater site has been completely altered from its original topography over the 59 years since the hotel began operation (Archaeology Mississippi, Inc., 1998). Large amounts of soil were imported as fill for the Broadwater golf course. In addition, soil has been excavated from wetland areas on the premises and deposited elsewhere on the golf course. Due to the extensive alterations that have occurred at the current Broadwater hotel and casino facilities, it is unlikely that any intact archaeological material exists within any of the previously developed areas of the site.

The three portions of the Broadwater site that have not been severely disturbed were systematically surveyed for cultural resources. No prehistoric archaeological sites were located by the survey (Archaeology Mississippi, Inc., 1998).

Terrestrial prehistoric archaeological resources located within areas of potential ground disturbance associated with construction activities for Alternative 3 have been previously disturbed by past construction and are unlikely to contain any intact archaeological material (personal communication, K. Baca, Director of Master Site File, Mississippi Department of Archives and History to R. Anchors, EDAW, August 11, 1999).

Mississippi's extensive shore protection efforts and associated dredging, combined with episodic sand settlement patterns immediately offshore, make the occurrence of intact archaeological resources in the waters surrounding the Broadwater site extremely unlikely. In addition, the shoreline of Biloxi is the largest manmade continuous shoreline in the United States and has undergone repeated beach renourishment and dredging of active navigation channels. Existing

1 dredge and fill and high sediment infilling into the Back Bay similarly reduce the likelihood of
2 intact archaeological resources occurring in the waters surrounding the Alternative 3 locations.

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4 The urban setting of the Proposed Action and its alternatives is unlikely to include areas of
5 sensitivity for Native American groups in the region. However, consultation has been initiated
6 with the appropriate tribal officials to ensure that any concerns are properly addressed.

7 8 **3.7.3 Historic Resources**

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10 The 1998 Archaeology Mississippi, Inc. survey revealed four previously unrecorded early- to
11 mid-twentieth century historic archaeological sites on the west side of the Broadwater site. None
12 of these sites is eligible for listing on the NRHP.

13
14 Waters surrounding the alternative sites have an extremely low probability of containing
15 submerged cultural resources due to the lack of depth and navigability. Shipwrecks more
16 commonly occur in deeper bay waters and the open waters of the gulf (personal communication,
17 K. Baca, Director of Master Site File, Mississippi Department of Archives and History to R.
18 Anchors, EDAW, August 11, 1999).

19
20 In the immediate area of the Broadwater site is Beauvoir, the home of Jefferson Davis during the
21 final 12 years of his life. The Beauvoir property occupies approximately 98 acres. Beauvoir is a
22 raised cottage with a residential story supported on nine-foot brick pillars above a full basement.
23 A broad flight of steps with balustrade rises to the veranda, which extends across the façade and
24 halfway around each side elevation. The floor plan of Beauvoir was evidently designed to take
25 advantage of natural ventilation provided by the gulf winds. A wide hall bisects the central
26 block of four rooms. Four rear rooms are offset from the main block, with two on each side. All
27 eight rooms open onto the front or rear verandahs, or both. In 1973, Beauvoir and its acreage
28 were listed on the NRHP, and in 1974, Beauvoir was listed as a National Historic Landmark. An
29 archaeological research project conducted by the Mississippi Department of Archives & History
30 has been ongoing since 1987. The purpose of this project is to determine the location of pre-
31 existing outbuildings associated with the Beauvoir home. The Mississippi Division of the Sons
32 of the Confederate Veterans, Jackson, Mississippi, owns the Beauvoir properties. The Beauvoir
33 properties retain substantial stands of trees and shrubbery that provide a protective barrier
34 surrounding the property, generally isolating it from adjacent sights and sounds, and also
35 allowing a high level of scenic integrity (Archaeology Mississippi, Inc., 1998).

36
37 The Broadwater Beach Hotel was constructed in 1937 and 1938 and opened to the public on
38 August 24, 1939. The original Art Deco design of the building was extensively modified in the
39 1950s, when much of the original structure was removed and the Art Deco façade was
40 demolished and replaced by a 1950s-style swayback canopy (Archaeology Mississippi, Inc.,
41 1998). In place of the removed portions of the hotel, a series of two- and three-story motel
42 buildings was constructed. Several small cottages were constructed or moved to the premises in
43 the 1930s. These cottages are still present on the Broadwater site and are in near-original
44 condition. The current marina located on the south side of US 90 was constructed in 1960. Due
45 to the redevelopment that has occurred on the Broadwater site since its opening, the original

1 hotel and the remaining associated structures are not architecturally or historically significant and
2 therefore are not eligible for listing on the NRHP, either individually or as a group.

3
4 Directly adjacent to the parcel encompassed by Site F is the location of a historic home locally
5 referred to as the Old Brick House. Sources disagree as to when the home was constructed, but
6 no source refers to the structure as built after 1850. In 1795 Jean Baptist Carquotte, Sr. settled
7 the parcel of land on which the Old Brick House is located (City of Biloxi, undated). The parcel
8 then stretched north and south across modern-day Biloxi from the Back Bay to the gulf and east
9 and west from what are now Lameuse and Bellman Streets (City of Biloxi, undated). The house
10 itself was reportedly constructed and initially occupied by John L. Henley and his family
11 (Bellande, undated). John L. Henley was then the sheriff of Biloxi and later helped to direct the
12 defense of Biloxi during the Civil War (Bellande, undated).

13
14 Since the time of Henley's ownership, the house has served as a residence, an office building, a
15 machine shop, and a junk shop (City of Biloxi, undated). In 1952 the Biloxi Garden Center was
16 chartered to administer the adaptive reuse of the house (Bellande, undated). The house has since
17 undergone several renovations and survived inundation from Hurricane Camille in 1969. The
18 orientation of the house shelters it from the development and traffic along Bayview Drive and
19 allows a high level of scenic integrity when viewed from the north side of the property. The
20 house was listed on the NRHP in 1973 and is now owned by the City of Biloxi. Currently, the
21 Old Brick House serves Biloxi as a unique community resource, hosting local traditions such as
22 the annual Spring Pilgrimage and housing public and private engagements. The house is open to
23 the general public for visitation.

24 25 **3.7.4 Other Resources**

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27 The Southern Memorial Park Cemetery is located adjacent to the Broadwater site to the east
28 immediately north of US 90. Although the cemetery is important to the city of Biloxi and many
29 of its residents, the cemetery is not eligible for listing on the NRHP and is not located in a
30 historic district (Archaeology Mississippi, Inc., 1998). Southern Memorial Park was created in
31 1932. It is approximately 10.5 acres (approximately 10,000 potential gravesites). The cemetery
32 has been privately owned by the Leowen Company since 1993 and operated for-profit. Nine
33 acres are currently used as plots or mausoleum space. About one acre remains for new plots or
34 mausoleum space (400 to 600 gravesites). Some of this area has been bought for plots, while the
35 rest remains for sale. There are approximately 90 to 100 burials per year, 70% of which occur
36 before noon and 30% of which occur in the afternoon. Visitation is allowed at any time. The
37 cemetery has hedges on the east and west edges which allow some visual buffering. The northern
38 and southern borders of the park have no hedges or visual buffers. Cemetery processions have
39 police escorts and there is generally enough parking within the cemetery to accommodate all
40 parking for funerals (personal communication, D. Coates, Southern Memorial Park Cemetery
41 Manager, and P. Peters, EDAW, Atlanta, May 8, 2000).